

### **REMARKS**

This responds to the Office Action mailed on July 3, 2006, and the references cited therewith.

Claims 1, 11-12, 22-28, 34 and 44-45 are amended, claims 5, 10, 38 and 43 are canceled without prejudice or disclaimer, and no claims are added; as a result, claims 1-4, 6-9, 11-37, 39-42 and 44-56 remain pending in this application.

The amendments to claims 11-12 and 44-45 correct dependency due to the cancellation of claims. The amendments to claims 23-27 clarify in the preamble that the system is a computer-implemented system. Amendments to claims 44-45 correct a typographical error such that the preamble of the dependent claim agrees with the base claim. Thus the amendments to claims 11-12, 23-27 and 44-45 were not made in response to a patentability rejection based on a reference.

#### **§101 Rejection of the Claims**

Claims 22-27 were rejected under 35 U.S.C. § 101 because the claimed invention was stated to be directed to non-statutory subject matter. Applicant has amended claims 22-27 to clarify that the system is a computer-implemented system. Applicant respectfully submits that the claims are directed to statutory subject matter. Applicant respectfully requests reconsideration and the withdrawal of the rejection of claims 22-27.

#### **§102 Rejection of the Claims**

Claims 1-56 were rejected under 35 U.S.C. § 102(b) for anticipation by Tijare et al. (U.S. 6,950,815). Anticipation requires the disclosure in a single prior art reference of each element of the claim under consideration. *In re Dillon* 919 F.2d 688, 16 USPQ 2d 1897, 1908 (Fed. Cir. 1990) (en banc), cert. denied, 500 U.S. 904 (1991). It is not enough, however, that the prior art reference discloses all the claimed elements in isolation. Rather, “[a]nticipation requires the presence in a single prior reference disclosure of each and every element of the claimed invention, *arranged as in the claim.*” *Lindemann Maschinenfabrik GmbH v. American Hoist &*

*Derrick Co.*, 730 F.2d 1452, 221 USPQ 481, 485 (Fed. Cir. 1984) (citing *Connell v. Sears, Roebuck & Co.*, 722 F.2d 1542, 220 USPQ 193 (Fed. Cir. 1983)) (emphasis added). Applicant respectfully traverses the rejection and submits that a *prima facie* case of anticipation does not exist because the claims contain elements not found in the Tijare.

For example, claim 1 as amended recites “reading metadata for a database, the metadata including a constraint definition for at least one column”, and “translating the metadata into a page definition language, the page definition language including a translation in accordance with the constraint definition.” Claims 22, 28 and 34 as amended recite similar language. Applicant has reviewed Tijare and can find no teaching or disclosure of using constraint data in the translation of metadata to a page description language. Now canceled claim 5 recited language regarding a constraint definition. In the rejection of now canceled claim 5, the Office Action asserts that Tijare, at column 3, lines 40-59 teaches reading a constraint definition. Applicant respectfully disagrees with this interpretation of Tijare. Nothing in the cited section, nor in Tijare as a whole, teaches or discloses anything related to constraint definition metadata. Further, Applicant has searched Tijare and can find no mention of the term “constraint” or any equivalent term. As a result, Tijare does not teach or disclose reading metadata having a constraint definition and translating the metadata containing the constraint definition into a page description language in accordance with the constraint definition. Thus Tijare does not teach or disclose each and every element of claims 1, 22, 28 and 34. Applicant respectfully requests reconsideration and the withdrawal of the rejection of claims 1, 22, 28 and 34.

Claims 2-4, 6-9, and 11-18 depend either directly or indirectly from claim 1. Claims 23-27 depend either directly or indirectly from claim 22. Claims 29-33 depend either directly or indirectly from claim 28. Claims 35-37, 39-42 and 44-49 depend either directly or indirectly from claim 34. These dependent claims inherit the elements of their respective base claims, and are therefore allowable for the same reasons as discussed above with respect to the base claims 1, 22, 28 and 34. Applicant respectfully requests reconsideration and the withdrawal of the rejection of claims 2-4, 6-9, 11-18, 23-27, 29-33, 35-37, 39-42 and 44-49.

Additionally, claims 4 and 37 recite “reading column definitions includes reading a null allowable indicator.” The Office Action, in rejecting claim 4, states “An Item is composed of one row from the database table representing the root component and zero or more rows from

each of the database tables” as teaching the recited language. Applicant notes that a Null value for a column value is different from whether zero or more rows exist for a table. Further, nowhere does Tijare teach or disclose any specialized translations for columns that allow Null values. As a result, Tijare does not teach or disclose each and every element of claims 4 and 37. Applicant respectfully requests reconsideration and the withdrawal of the rejection of claims 4 and 37.

Claims 9 and 42 recite “translating the metadata includes translating a foreign key reference to a multi-selectable user interface element.” The Office Action, in the rejection of claim 9, states that Tijare, at column 12, lines 5-30 teaches the recited language. Applicant respectfully disagrees with this interpretation of Tijare. The cited section merely states that wild cards and descendant axis notations may be used. Applicant notes that this has nothing to do with translating a foreign key reference into a user interface element having multiple selectable items in the user interface element. Further, Applicant has reviewed Tijare and can find no teaching of translating metadata or foreign key references into a user interface element having multiple selectable items based on the foreign key references. Thus Tijare fails to teach or disclose each and every element of claims 9 and 42. Applicant respectfully requests reconsideration and the withdrawal of the rejection of claims 9 and 42.

Claims 11 and 44 recite that the constraints may be a validation rule and claims 12 and 45 recited that the constraints may be a database integrity rule. The Office Action states that Tijare, at column 6, lines 15-29 teaches the recited language. Applicant respectfully disagrees with this interpretation of Tijare. Neither the cited section nor Tijare as whole teaches or discloses constraints. Further, Tijare does not teach or disclose using database integrity rules or validation rules in translating metadata into a page description language. As a result, Tijare does not teach or disclose each and every element of claims 11, 12, 44 and 45. Applicant respectfully requests reconsideration and the withdrawal of the rejection of claims 11, 12, 44 and 45.

Claims 19-33 were stated in the Office Action to recite a system for carrying out the similar methods claimed in claims 1-18 and were rejected under similar rationale to claims 1-18. Applicant respectfully submits that claims 19-33 are allowable for the same reasons as discussed above with respect to claims 1-18. Applicant respectfully requests reconsideration and the withdrawal of the rejection of claims 19-33.

Further, Claim 19 recites receiving a request for a web page, translating metadata for a database into HTML for the web page, and sending the web page to the requestor. Claims 50 and 53 recite similar language. Applicant notes that Tijare is directed to providing XML that can be queried using simpler query formulations than for an underlying content management system (see Abstract). While Tijare does disclose that content can include web page content, nowhere does Tijare teach or disclose receiving a request for a web page, or translating database metadata into HTML that is supplied in response to the web page request. Thus Tijare does not anticipate claims 19, 50 and 53. Applicant respectfully requests reconsideration and the withdrawal of the rejection of claims 19, 50 and 53.

Claim 20 recites “translating at least one constraint in the metadata into the ColdFusion scripting language.” Claim 51 recites similar language. As discussed above, Tijare does not teach or suggest translating constraints in metadata. Therefore Tijare does not anticipate claim 20 or 51. Applicant respectfully requests reconsideration and the withdrawal of the rejection of claims 20 and 51.

Claims 34-56 were stated in the Office Action to recite computer-readable media for carrying out the similar methods claimed in claims 1-18 and were rejected under similar rationale to claims 1-18. Applicant respectfully submits that pending claims 34-37, 39-42, and 44-56 are allowable for the same reasons as discussed above with respect to claims 1-18.

**CONCLUSION**

Applicant respectfully submits that the pending claims are in condition for allowance, and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's attorney at (612) 373-6954 to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743.

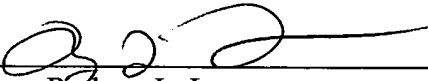
Respectfully submitted,

CRAIG KICKEL

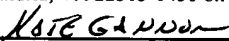
By his Representatives,

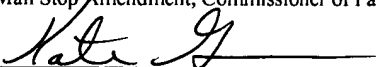
SCHWEGMAN, LUNDBERG, WOESSNER & KLUTH, P.A.  
P.O. Box 2938  
Minneapolis, MN 55402  
(612) 373-6954

Date October 3, 2006

By   
Rodney L. Lacy  
Reg. No. 41,136

**CERTIFICATE UNDER 37 CFR 1.8:** The undersigned hereby certifies that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail, in an envelope addressed to: Mail Stop Amendment, Commissioner of Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on this 3 day of October 2006.

  
Name

  
Signature